

District Judge Tana Lin

UNITED STATES DISTRICT COURT FOR THE  
WESTERN DISTRICT OF WASHINGTON  
AT TACOMA

LAKHVINDER SINGH,

Plaintiff,

v.

UR M. JADDOU, *et al.*,

Defendants.

Case No. 3:24-cv-05755-TL

STIPULATED MOTION TO HOLD  
CASE IN ABEYANCE AND  
~~[PROPOSED]~~ ORDER

Noted for Consideration:  
November 12, 2024

Plaintiff and Defendants, pursuant to Federal Rule of Civil Procedure 6 and Local Rules 7(d)(1), 10(g) and 16, hereby jointly stipulate and move to stay these proceedings until May 14, 2025. Plaintiff brought this litigation pursuant to the Administrative Procedure Act and Mandamus Act seeking, *inter alia*, to compel the U.S. Citizenship and Immigration Services (“USCIS”) adjudicate his Forms I-589, Application for Asylum and for Withholding of Removal. Defendants’ response to the Complaint is currently due on November 12, 2024. The parties are currently working towards a resolution to this litigation. For good cause, the parties request that the Court hold the case in abeyance until May 14, 2025.

Courts have “broad discretion” to stay proceedings. *Clinton v. Jones*, 520 U.S. 681, 706 (1997). “[T]he power to stay proceedings is incidental to the power inherent in every court to

1 control the disposition of the causes on its docket with economy of time and effort for itself, for  
2 counsel, and for litigants.” *Landis v. N. Am. Co.*, 299 U.S. 248, 254 (1936); *see also* Fed. R. Civ.  
3 P. 1.

4 With additional time, this case may be resolved without the need of further judicial  
5 intervention. USCIS has scheduled Plaintiff’s asylum interview for January 14, 2025. USCIS  
6 agrees to diligently work towards completing the adjudication within 120 days of the interview,  
7 absent unforeseen or exceptional circumstances that would require additional time  
8 for adjudication. If the adjudication is not completed within that time, USCIS will provide a  
9 status report to the Court.

10 Plaintiff will submit all supplemental documents and evidence, if any, to USCIS seven to  
11 ten days prior to the interview date. Plaintiff recognizes that failure to submit documents prior to  
12 the interview may require the interview to be rescheduled and the adjudication delayed.  
13 If needed, Plaintiff will bring an interpreter to the interview, otherwise the interview will need to  
14 be rescheduled and the adjudication delayed. After the interview, USCIS will need time  
15 to adjudicate Plaintiff’s asylum application. Once the application is adjudicated, Plaintiff  
16 will dismiss the case. Accordingly, the parties request this abeyance to allow USCIS to  
17 conduct Plaintiff’s asylum interview and then process his asylum application.

18 As additional time is necessary for this to occur, the parties request that the Court hold  
19 the case in abeyance until May 14, 2025. The parties will submit a joint status report on  
20 or before May 14, 2025.

21 //

22 //

23 //

24 //


1 Dated: November 7, 2024

Respectfully submitted,

2 TESSA M. GORMAN  
United States Attorney

3 s/Michelle R. Lambert  
4 MICHELLE R. LAMBERT, NYS #4666657  
Assistant United States Attorney  
5 1201 Pacific Avenue, Suite 700  
Tacoma, Washington 98402  
6 Phone: 206-428-3824  
Email: michelle.lambert@usdoj.gov  
7 *Attorneys for Defendants*

8 ***I certify that this memorandum contains***  
9 ***396 words, in compliance with the Local***  
10 ***Civil Rules.***

11   
LAKHVINDER SINGH  
12 11116 125<sup>TH</sup> Street Ct E  
Puyallup, Washington 98374  
13 Phone: 425-524-3448  
Email: gtstruckingllc1984@gmail.com  
14 *Pro Se Plaintiff*

CERTIFICATE OF SERVICE

I hereby certify that I am an employee in the Office of the United States Attorney for the Western District of Washington and of such age and discretion as to be competent to serve papers.

I further certify on this date, I electronically filed the foregoing with the Clerk of the Court using the CM/ECF system, which will send notice of such filing to the following CM/ECF participant(s):

- 0 -

I further certify on this date, I arranged for service of the foregoing on the following non-CM/ECF participant(s), via Certified Mail with return receipt, postage prepaid, addressed as follows:

Lakhvinder Singh, *Pro Se Plaintiff*  
11116 125th Street Ct E  
Puyallup, WA 98374

DATED this 12th day of November, 2024.

s/ Stephanie Huerta-Ramirez  
STEPHANIE HUERTA-RAMIREZ, Legal Assistant  
United States Attorney's Office  
Western District of Washington  
700 Stewart Street, Suite 5220  
Seattle, WA 98101  
Phone: (206) 553-7970  
Fax: (206) 553-4073  
Email: [Stephanie.Huerta-Ramirez@usdoj.gov](mailto:Stephanie.Huerta-Ramirez@usdoj.gov)

**[PROPOSED] ORDER**

The case is held in abeyance until May 14, 2025. The parties shall submit a joint status report on or before May 14, 2025. It is so **ORDERED**.

DATED this 12th day of November, 2024.



TANA LIN  
United States District Judge